

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

COUNCIL ON AMERICAN-ISLAMIC
RELATIONS – MINNESOTA AND
LEAGUE OF WOMEN VOTERS OF
MINNESOTA,

Plaintiff,

v.

ATLAS AEGIS LLC, ANTHONY
CAUDLE, JOHN DOES #1-10,

Defendants.

Civil Action No. 0:20-cv-02195

**MOTION FOR TEMPORARY
RESTRAINING ORDER AND
PRELIMINARY INJUNCTION**

Plaintiffs Council on American-Islamic Relations-Minnesota and League of Women Voters of Minnesota (“Plaintiffs”) assert claims against Atlas Aegis LLC and Anthony Caudle (“Defendants”) and additional John Doe defendants for intimidating or attempting to intimidate voters in violation of Section 11(b) of the Voting Rights Act of 1965 based on the recruitment, advertising, and deployment of ex-soldiers to Minnesota polling sites during the federal election. Plaintiffs now move the Court for a temporary restraining order and preliminary injunction against Defendants and seek an order from the Court:

1. Temporarily enjoining Defendants, and anyone acting in concert with Defendants, from: (a) deploying armed agents within 2,500 feet of Minnesota polling places or to otherwise monitor Minnesota polling places during the 2020 election; (b) threatening to deploy armed agents to Minnesota polling places; (c) otherwise intimidating, threatening, or coercing voters in connection with voting activities in Minnesota; and (d)

disclosing within 24 hours of receipt of the temporary restraining order, the telephone numbers, email and mailing addresses of John Does #1-10;

2. Ordering that Plaintiff is not required to give security as provided in Fed. R. Civ. P. 65(c); and

3. Ordering such other and further relief as the Court deems just and equitable.

This Motion is brought pursuant to Fed. R. Civ. P. 65 and is based on all of the files, records, and proceedings herein, including without limitation the contemporaneously-filed Declarations, Exhibits, Memorandum of Law, the arguments of counsel, and all other supporting documents and pleadings which are or may be submitted, and all other filings and proceedings in the above-captioned action.

Date: October 20, 2020

Respectfully submitted,

s/Julia Dayton Klein

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ATTORNEYS FOR PLAINTIFFS

*Motions for admission *pro hac vice*
forthcoming